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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARIO GONZALEZ,

Defendant.

CASE NO. 2:20-CR-00013 WBS

STIPULATION AND ORDER TO CONTINUE
JUDGMENT AND SENTENCING HEARING AND
MODIFY PRESENTENCE SCHEDULE

DATE: June 26, 2023
TIME: 9:00 a.m.
COURT: Hon. William B. Shubb

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for judgment and sentencing on June 26, 2023.
2. By this stipulation, the parties now move to continue the judgment and sentencing hearing until November 13, 2023. The parties understand that this date is available to the Court for a continued judgment and sentencing hearing.
3. The assigned probation officer is working to complete the presentence investigation process, and an extended timeline for the presentence report is necessary. Moreover, this matter is likely going to be assigned to a new probation officer in the near term, and the new probation officer will need time to familiarize himself/herself with this case. Finally, the parties desire additional time to conduct investigation of matters that may be relevant to sentencing.

4. It is therefore requested that the PSR and judgment and sentencing schedule be modified as follows:

- a) Proposed Presentence Report Due: October 2, 2023
- b) Written Objections to Presentence Report Due: October 16, 2023
- c) Presentence Report Due: October 23, 2023
- d) Motion for Correction of Presentence Report Due: October 30, 2023
- e) Reply or Statement Due: November 6, 2023
- f) Judgment and Sentencing: **November 13, 2023, 9:00 a.m.**

IT IS SO STIPULATED.

Dated: June 21, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ AARON D. PENNEKAMP

AARON D. PENNEKAMP
EMILY G. SAUVAGEAU
Assistant United States Attorneys

Dated: June 21, 2023

/s/ TAMARA SOLOMAN

TAMARA SOLOMAN
TASHA CHALFANT
Counsel for Defendant
MARIO GONZALEZ

ORDER

IT IS SO FOUND AND ORDERED.

Dated: June 21, 2023



WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE